

## REMARKS

Claim 13 calls for a semiconductor substrate, an interconnection layer positioned over the substrate, a passive circuit element between the substrate and the interconnection layer, and a trench that encircles the passive circuit element. Thus, the trench must encircle the passive circuit element. Moreover, the trench must be filled with conductive material.

In the case of the cited Allman reference, the trench 165, shown in Figures 7 and 8, is defined to form the passive circuit element. Namely, the material 170, in Figure 8, is modified in Figure 9 to actually form the capacitor 140 to have a right plate 142 and a left plate 144. The trench cannot encircle the passive element because the trench is part of the passive element. Thus, a trench filled with conductive material does not encircle the passive element but, rather, the trench defines the passive element.

In view of these remarks, reconsideration of the rejection of claim 13 and the claims dependent thereon is respectfully requested.

Claim 24 calls for an integrated circuit comprising a semiconductor substrate, an active circuit element formed in the substrate, and a guard ring encircling the active circuit element formed in the substrate. A trench filled with a conductive material is coupled to the guard ring.

It is not clear what is believed to be the guard ring. If it is the elements 102 or 104, it is clear that these are leads or vias and, therefore, cannot encircle anything. Thus, there is no guard ring encircling the active circuit element formed in the substrate. Also, even if the elements 102 or 104 are the guard rings, it is not clear what trench filled with conductive material they are coupled to.

Therefore, reconsideration of the rejection of claim 24 and its dependent claims is respectfully requested.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested.

Respectfully submitted,

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